

Pg 1 of 1
CLEARY GOTTlieb STEEN & HAMILTON LLP

One Liberty Plaza
New York, NY 10006-1470

T: +1 212 225 2000

F: +1 212 225 3999

clearygottlieb.com

WASHINGTON, D.C. • PARIS • BRUSSELS • LONDON • MOSCOW
FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG
BEIJING • BUENOS AIRES • SÃO PAULO • ABU DHABI • SEOUL

D: +1 212-225-2086
jrosenthal@cgsh.com

THOMAS J. MOLONEY	MARGARET S. PEONIS	HUGH C. CONROY, JR.
RICHARD S. LINGER	LISA M. SCHWEITZER	JOSEPH LANZKRON
JAMES A. DUNCAN	JUAN G. GIRÁLDEZ	MAURICE R. GINDI
STEVEN M. LOEB	DUANE MCLAUGHLIN	KATHERINE R. REAVES
CRAIG B. BROD	BREON S. PEACE	RAHUL MUKHI
NICOLAS GRABAR	CHANTALE E. KORDULA	ELANA S. BRONSON
CHRISTOPHER E. AUSTIN	BENET J. O'REILLY	MANUEL SILVA
HOWARD S. ZELBO	ADAM E. FLEISHER	KYLE A. HARRIS
DAVID E. BRODSKY	SEAN A. O'NEAL	LINA BENSMAN
ARTHUR H. KOHN	GLENN P. MCGRORY	ARON M. ZUCKERMAN
RICHARD J. COOPER	MATTHEW P. SALERNO	RESIDENT PARTNERS
JEFFREYS S. LEWIS	MICHAEL J. ALBANO	SANDRA M. ROCKS
PAUL J. SHIM	VICTOR L. HOU	JUDITH KASSEL
STEVEN L. WILNER	ROGER A. COOPER	PENELOPE L. CHRISTOPHOROU
ANDRES DE LA CRUZ	AMY R. SHAPIRO	BOAZ S. MORAG
DAVID C. LOPEZ	JENNIFER KENNEDY PARK	MARY E. ALCOCK
MICHAEL A. GERSTENZANG	ELIZABETH LENAS	HEIDE H. ILGENFRITZ
LEV L. DASSIN	LUKE A. BAREFOOT	KATHLEEN M. EMBERGER
NEIL Q. WHORISKEY	JONATHAN S. KOLODNER	AVRAM E. LUFT
JORGE U. JUANTORENA	DANIEL IAN	ANDREW WEAVER
MICHAEL D. WEINBERGER	MEYER H. FEDIDA	HELENA K. GRANNIS
DIANA L. WOLLMAN	ADRIAN R. LEIPSIC	JOHN V. HARRISON
JEFFREY A. ROSENTHAL	ELIZABETH VICENS	CAROLINE F. HAYDAY
MICHAEL D. DAYAN	ADAM J. BRENNEMAN	NEIL R. MARKEL
CARMINE D. BOCCUZZI, JR.	ARI D. MACKINNON	KENNETH S. BLAZEJEWSKI
JEFFREY D. KARPFF	JAMES E. LANGSTON	LAURA BAGARELLA
KIMBERLY BROWN BLACKLOW	JARED GERBER	SHIRLEY M. LO
ROBERT J. RAYMOND	COLIN D. LLOYD	JONATHAN D.W. GIFFORD
SUNG K. KANG	COREY M. GOODMAN	SUSANNA E. PARKER
SANDRA L. FLOW	RISHI ZUTSHI	DAVID W.S. YUDIN
FRANCISCO L. CESTERO	JANE VANLARE	RESIDENT COUNSEL
FRANCESCA L. ODELL	DAVID H. HERRINGTON	LOUISE M. PARENT
WILLIAM J. MCRAE	KIMBERLY R. SPOERRI	OF COUNSEL
JASON FACTOR	AARON J. MEYERS	
JOON H. KIM	DANIEL C. REYNOLDS	
	ABENA A. MAINOO	

May 4, 2020

VIA ELECTRONIC MAIL AND ECF

The Honorable Sean H. Lane
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, NY 10004-1408
shl.chambers@nysb.uscourts.gov

Re: *In re BSG Resources Limited*, No. 19-11845 (SHL)

Dear Judge Lane:

On behalf of Vale S.A. (“Vale”), we are in receipt of the Joint Administrators’ letter dated May 4, 2020 requesting a pre-motion conference and providing a status update. As this status update was neither submitted in consultation with us nor shared with us prior to its submission, we believe that several pertinent facts have been omitted. Vale intends to submit its letter no later than tomorrow morning and we ask the Court to refrain from consideration until that time.

Respectfully submitted,

/s/ Jeffrey A. Rosenthal

cc: Frederick Hyman, Esq.